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**U.S. Department of
Homeland Security**

**United States
Coast Guard**



Commanding Officer
United States Coast Guard
Civil Engineering Unit Cleveland

1240 East Ninth Street
Room 2179
Cleveland Ohio 44199-2060
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11000

APR 01 2011

United States Environmental Protection Agency
Region 5
Superfund Div, SR-6J
Remedial Response Section 6
Mr. Owen Thompson
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Mr. Thompson:

Please find the attached Draft Final QAPP Addendum and Revised FSP for USCG Detroit Atwater Facility for your review and comment. As we have previously discussed, a Revised FSP was completed to include groundwater sampling in the CERCLA Investigation, and an Addendum to the QAPP was completed to capture changes to the relevant worksheets due to the addition of groundwater sampling.

If you have any questions or would like to discuss these documents in detail, please contact Ms. Lynn Keller at (216) 902-6258.

Sincerely,

Frank A. Blaha
Chief, Environmental Compliance
By direction of the Commanding Officer

Enclosures (1) Draft Final QAPP Addendum (hard copy and CD): USCG Atwater Facility, Detroit, Michigan, March 2011
(2) Draft Final FSP Rev 2.0 (hard copy and CD): USCG Atwater Facility, Detroit, Michigan, March 2011

Copy: Joe Logan, Tetra Tech NUS w/o encl

**US-EPA COMMENTS ON DRAFT QAPP ADDENDUM WORKSHEET 2G
CROSSWALK , USCG ATWATER DETROIT**

COMMENTS:

1. **QAPPA Worksheet #2G QAPP Identifying Information:** In response to USEPA Comment on revising QAPPA Worksheet 2G to better reflect a crosswalk between the QAPP, and QAPPA, we find the changes to QAPPA Worksheet 2G to be acceptable, and approve of those modifications.

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION V**

DATE: April 27, 2011

FROM: Michael Chrystof

TO: Owen Thompson, Remedial Project Manager

SUBJECT: US-EPA Comments on Draft QAPP-Addendum (March 2011); Worksheet 2G Crosswalk (dated April, 2011), for USCG Atwater Detroit site, Detroit, MI.

Attachment:

QAPP Worksheet #2G QAPP Identifying Information

Site Name/Project Name:	Atwater Facility
Site Location:	2660 East Atwater Street, Detroit, Wayne County, Michigan.
Site Number/Code:	NA
Operable Unit:	NA
Contractor Name:	Tetra Tech NUS, Inc.
Contractor Number:	HSCG83-08-D-3CL109
Contract Title:	CERCLA Investigation
Work Assignment Number:	HSCG83-09-J-3CL358
Identify guidance used to prepare QAPP:	Uniform Federal Policy for Quality Assurance Project Plans, Manual VI (2005)
Identify regulatory program:	Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
Identify approval entity:	NA
Indicate whether the QAPP is a generic or a project-specific QAPP?	This QAPP is a project-specific QAPP intended to serve the needs of the Site Evaluation and Removal Action activities, as described in the FSPG&S, Tetra Tech NUS, Inc., 2011.
List dates of scoping sessions that were held:	June 20, 2007 at USEPA Region 5 offices in Chicago, Illinois Understanding of Scope of Services dated September 2009

QAPP Worksheet #2G QAPP Identifying Information

List dates and titles of QAPP documents written for previous site work, if applicable:	
Quality Assurance Project Plan	QAPP, March 2010
List organizational partners (stakeholders) and connection with lead organization:	U.S. Coast Guard – Lead Agency
List data users:	U.S. Coast Guard Project Team
Lead Organization's Program Manager:	Frank Blaha, U.S. Coast Guard, Program Manager

QAPP Worksheet #2G QAPP Identifying Information

Required QAPP Element(s) and Corresponding QAPP Section(s) (per UFP QAPP 2005)	Required Information	Crosswalk to Related Information and Documents
Project Management and Objectives		
2.1 Title and Approval Page	- Title and Approval Page	- Worksheet #1G Title and Approval Page
2.2 Document Format and Table of Contents	- Table of Contents	- The Table of Contents is provided following the QAPP cover page.
2.2.1 Document Control Format	- QAPP Identifying Information	- Worksheet #2G QAPP Identifying Information
2.2.2 Document Control Numbering System		
2.2.3 Table of Contents		
2.2.4 QAPP Identifying Information		
2.3 Distribution List and Project Personnel Sign-Off Sheet	- Distribution List - Project Personnel Sign-Off Sheet	- Worksheet #3G Distribution List/ Personnel Sign-Off
2.3.1 Distribution List		Note: Worksheet 3G and 4G combined
2.3.2 Project Personnel Sign-Off Sheet		

QAPP Worksheet #2G QAPP Identifying Information

Required QAPP Element(s) and Corresponding QAPP Section(s) (per UFP QAPP 2005)	Required Information	Crosswalk to Related Information and Documents
2.4 Project Organization 2.4.1 Project Organizational Chart 2.4.2 Communication Pathways 2.4.3 Personnel Responsibilities and Qualifications 2.4.4 Special Training Requirements and Certification	<ul style="list-style-type: none"> - Project Organizational Chart - Communication Pathways - Personnel Responsibilities and Qualifications Table - Special Personnel Training Requirements Table 	<ul style="list-style-type: none"> - Worksheet #5G Project Organization Chart - Worksheet #6 Communication Pathways - Worksheet #7 Personnel Responsibilities and Qualifications and - Worksheet #8G Special Personnel Training Requirements
2.5 Project Planning/Problem Definition 2.5.1 Project Planning (Scoping) 2.5.2 Problem Definition, Site History and Background	<ul style="list-style-type: none"> - Project Planning Session Documentation (including Data Needs tables) - Project Scoping Session Participants Sheet - Problem Definition, Site History and Background - Site Maps (historical and present) 	<ul style="list-style-type: none"> - Worksheet #9G Project Team Planning Sessions Participants' Sheet and - Worksheet #10G Problem Definition for Project Data Quality Objectives) <p>Site history and more detail concerning the project Data Quality Objectives can be found in the FSPG&S, Tetra Tech NUS, Inc., 2011.</p> <p>Site maps are provided in the FSPG&S, Tetra Tech NUS, Inc., 2011. Prepared for the Site.</p>

QAPP Worksheet #2G QAPP Identifying Information

Required QAPP Element(s) and Corresponding QAPP Section(s) (per UFP QAPP 2005)	Required Information	Crosswalk to Related Information and Documents
2.6 Project Quality Objectives and Measurement Performance Criteria 2.6.1 Development of Project Quality Objectives Using the Systematic Planning Process 2.6.2 Measurement Performance Criteria	<ul style="list-style-type: none"> - Site-Specific Project Quality Objectives - Measurement Performance Criteria Table 	<ul style="list-style-type: none"> - Worksheet #11G Project Quality Objectives/Systematic Planning Process Statements and - Worksheet #12-1G Measurement Performance Criteria for project analytes
2.7 Secondary Data Evaluation	<ul style="list-style-type: none"> - Sources of Secondary Data and Information - Secondary Data Criteria and Limitations Table 	<ul style="list-style-type: none"> - Worksheet #13 Secondary Data Criteria and Limitations
2.8 Project Overview and Schedule 2.8.1 Project Overview 2.8.2 Project Schedule	<ul style="list-style-type: none"> - Summary of Project Tasks - Reference Limits and Evaluation Table - Project Schedule/Timeline Table 	<ul style="list-style-type: none"> - Worksheet #14G Summary of Project Tasks - Worksheet #15-2G Reference Limits and Evaluation for specific monitoring activities and - Worksheet #16G Project Schedule/Timeline

QAPP Worksheet #2G QAPP Identifying Information

Required QAPP Element(s) and Corresponding QAPP Section(s) (per UFP QAPP 2005)	Required Information	Crosswalk to Related Information and Documents
Measurement/Data Acquisition		
3.1 Sampling Tasks		
3.1.1 Sampling Process Design and Rationale	- Sampling Design and Rationale	- Worksheet #17G Sampling Design and Rationale
3.1.2 Sampling Procedures and Requirements	- Sample Location Map	- Worksheet #18G Sampling Locations and Methods/Standard Operating Procedure Requirements for the project
3.1.2.1 Sampling Collection Procedures	- Sampling Locations and Methods/Standard Operating Procedure Requirements Table	- Worksheet #18G Sampling Locations and Methods/Standard Operating Procedure Requirements for the project
3.1.2.2 Sample Containers, Volume and Preservation	- Analytical Methods/Standard Operating Procedure Requirements Table	- Worksheet #19G Analytical Standard Operating Procedure Requirements (Sample Containers Preservation and Holding Times)
3.1.2.3 Equipment/Sample Containers Cleaning and Decontamination Procedures	- Field Quality Control Sample Summary Table	- Worksheet #20G Sample Quantities and Control Frequencies
3.1.2.4 Field Equipment Calibration, Maintenance, Testing and Inspection Procedures	- Sampling Standard Operating Procedures	- Worksheet #21G Field Sampling Standard Operating Procedure References
3.1.2.5 Supply Inspection and Acceptance Procedures	- Field Equipment Calibration, Maintenance, Testing and Inspection Table	- Worksheet #22G Field Equipment Calibration, Maintenance, Testing, and Inspection
3.1.2.6 Field Documentation Procedures		More details concerning the sampling design, rational and procedures can be found in the FSPG&S, Tetra Tech NUS, Inc., 2011.

QAPP Worksheet #2G QAPP Identifying Information

Required QAPP Element(s) and Corresponding QAPP Section(s) (per UFP QAPP 2005)	Required Information	Crosswalk to Related Information and Documents
3.2 Analytical Tasks 3.2.1 Analytical SOPs 3.2.2 Analytical Instrument Calibration Procedures 3.2.3 Analytical Instrument and Equipment Maintenance, Testing and Inspection Procedures 3.2.4 Analytical Supply Inspection and Acceptance Procedures	<ul style="list-style-type: none"> - Analytical Standard Operating Procedures - Analytical Standard Operating Procedure References Table - Analytical Instrument Calibration Table - Analytical Instrument and Equipment Maintenance, Testing and Inspection Table 	<ul style="list-style-type: none"> - Worksheet #23G Analytical Standard Operating Procedure References - Worksheet #24 Analytical Instrument Calibration - Worksheet #25 Analytical Instrument and Equipment Maintenance, Testing and Inspection <p>The analytical Standard Operating Procedures can be found in Attachment T-1</p>
3.3 Sample Collection Documentation, Handling, Tracking and Custody Procedures 3.3.1 Sample Collection Documentation 3.3.2 Sample Handling and Tracking System 3.3.3 Sample Custody	<ul style="list-style-type: none"> - Sample Collection Documentation Handling, Tracking and Custody Standard Operating Procedures - Sample Container Identification - Sample Handling Flow Diagram - Example Chain-of-Custody Form and Seal 	<ul style="list-style-type: none"> - Worksheet #26 Sample Handling System - Worksheet #27G Sample Custody Requirements - An example of the Chain-of-Custody form can be found in Attachment 1 <p>More details concerning the field sampling procedures can be found in the FSPG&S, Tetra Tech NUS, Inc., 2011.</p>

QAPP Worksheet #2G QAPP Identifying Information

Required QAPP Element(s) and Corresponding QAPP Section(s) (per UFP QAPP 2005)	Required Information	Crosswalk to Related Information and Documents
3.4 Quality Control Samples 3.4.1 Sampling Quality Control Samples 3.4.2 Analytical Quality Control Samples	<ul style="list-style-type: none">- QC Samples Table- Screening/Confirmatory Analysis Decision Tree	<ul style="list-style-type: none">- Worksheet #28-1G presents Quality Control sample information for project analytes
3.5 Data Management Tasks 3.5.1 Project Documentation and Records 3.5.2 Data Package Deliverables 3.5.3 Data Reporting Formats 3.5.4 Data Handling and Management 3.5.5 Data Tracking and Control	<ul style="list-style-type: none">- Project Documents and Records Table- Analytical Services Table	<ul style="list-style-type: none">- Worksheet #29G Project Documents and Records- Worksheet #30G Analytical Services

QAPP Worksheet #2G QAPP Identifying Information

Required QAPP Element(s) and Corresponding QAPP Section(s) (per UFP QAPP 2005)	Required Information	Crosswalk to Related Information and Documents
Assessment/Oversight		
4.1 Assessments and Response Actions 4.1.1 Planned Assessments 4.1.2 Assessment Findings and Corrective Action Responses	<ul style="list-style-type: none"> - Assessments and Response Actions - Planned Project Assessments Table - Audit Checklists - Assessment Findings and Corrective Action Responses Table 	<ul style="list-style-type: none"> - Worksheet #31 Planned Project Assessments - Worksheet #32 Assessment Findings and Corrective Action Responses <p>Laboratory Certifications can be found in Attachment 2</p>
4.2 QA Management Reports	<ul style="list-style-type: none"> - Conformance of project activities to QAPP requirements and procedures - Status of project and schedule delays - Deviations from the approved QAPP and approved amendments to the QAPP - Results of data review activities - Required corrective actions and effectiveness of corrective action implementation - Data usability assessments in terms of precision, accuracy, representativeness, completeness, comparability, and sensitivity 	<ul style="list-style-type: none"> - Worksheet #33 Quality Assurance Management Reports
4.3 Final Project Report	<ul style="list-style-type: none"> - All Quality Assurance Management Reports attached - Additional data quality concerns and resolution documentation 	<ul style="list-style-type: none"> - Worksheet #33 Quality Assurance Management Reports

QAPP Worksheet #2G QAPP Identifying Information

Required QAPP Element(s) and Corresponding QAPP Section(s) (per UFP QAPP 2005)	Required Information	Crosswalk to Related Information and Documents
Data Review		
5.1 Overview		
5.2 Data Review Steps	- Verification (Step I) Process Table	- Worksheet #34 Verification (Step I) Process
5.2.1 Step I: Verification		
5.2.2 Step II: Validation	- Validation (Steps IIa and IIb) Process Table	- Worksheet #35 Validation (Steps IIa and IIb) Process
5.2.2.1 Step IIa Validation Activities		
5.2.2.2 Step IIb Validation Activities	- Validation (Steps IIa and IIb) Summary Table	- Worksheet #36G Validation (Steps IIa and IIb) Summary
5.2.3 Step III: Usability Assessment	- Usability Assessment	- Worksheet #37 Usability Assessment
5.2.3.1 Data Limitations and Actions from Usability Assessment		
5.2.3.2 Activities		

QAPP Worksheet #2G QAPP Identifying Information

Required QAPP Element(s) and Corresponding QAPP Section(s) (per UFP QAPP 2005)	Required Information	Crosswalk to Related Information and Documents
5.3 Streamlining Data Review 5.3.1 Data Review Steps To Be Streamlined 5.3.2 Criteria for Streamlining Data Review 5.3.3 Amounts and Types of Data Appropriate for Streamlining	None	NA

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION V**

DATE: April 20, 2011

FROM: Michael Chrystof

TO: Owen Thompson, Remedial Project Manager

SUBJECT: US-EPA Comments on Draft QAPP Addendum (dated March, 2011), for
USCG Atwater Detroit site, Detroit, MI.

Attachment:

US-EPA COMMENTS ON DRAFT QAPP ADDENDUM, USCG ATWATER DETROIT

COMMENTS:

1. **QAPPA Worksheet #2G QAPP Identifying Information:** It would be helpful if Worksheet 2G indicated which Worksheet version is to be used, as the QAPP Addendum is appended to the original QAPP. List the crosswalk to indicate when the original QAPP worksheet, or "G" version is applicable. An example would be: Worksheet 5G, Worksheet 6, Worksheet 7, Worksheet 8G, etc. so that QAPP and QAPPA users will know which to utilize.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF: SR-6J

April 20, 2011

Frank A. Blaha
Chief, Environmental Compliance
United States Coast Guard
Civil Engineering Unit
1240 East Ninth Street, Room 2179
Cleveland, OH 44199-2060

Re: Quality Assurance Project Plan Addendum (QAPPA) and
Field Sampling Plan
U.S. Coast Guard Atwater Facility
Detroit, Michigan
Tetra Tech NUS, Inc., March 2011
Transmitted by your April 1, 2011 letter

Dear Mr. Blaha:

U.S. EPA has completed its review of the subject documents. The documents are approved except as noted in the following comment.

QAPPA Worksheet #2G QAPP Identifying Information: It would be helpful if Worksheet 2G indicated which Worksheet version is to be used, as the QAPP Addendum is appended to the original QAPP. Modify the crosswalk to indicate whether the original QAPP worksheet, or "G" version is applicable for each element and section. An example would be: Worksheet 5G, Worksheet 6, Worksheet 7, Worksheet 8G, etc. so that QAPP and QAPPA users will know which to utilize.

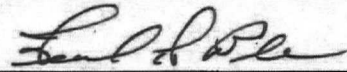
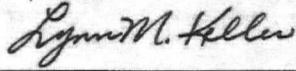
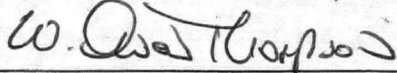
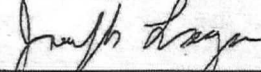
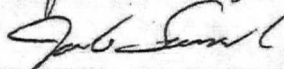
If you have any questions I can be reached at 312 886-4843.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. Owen Thompson", is written above the printed name.

W. Owen Thompson
Remedial Project Manager
Superfund Remedial Response Section Six

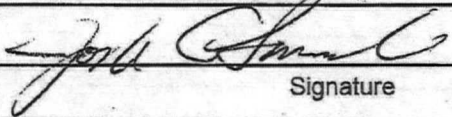
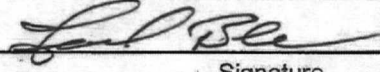
QAPP Worksheet #4G Project Personnel Sign-Off

Organization/Project Personnel	Title	Telephone Number	Signature	Date QAPP Read
Frank Blaha	Program Manager	216.902.6255		4/27/11
Lynn Keller	Project Manager	216.902.6258		4/26/11
Owen Thompson	USEPA Remedial Project Manager	312.886.4843		4/27/11
Joseph Logan	Project Coordinator	412.921.7231		4/26/11
Joseph Samchuck	Data Quality Assurance Manager	412.921.8510		4/26/11

QAPP Worksheet #3G Distribution List/Project Personnel Sign-Off

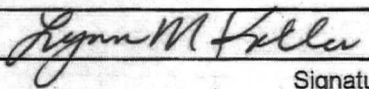
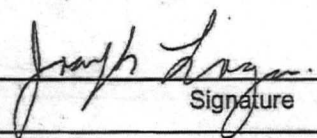
QAPP Recipients	Title	Organization	Telephone Number	Fax Number	E-mail Address	Signature/Date QAPP Read	Document Control Number
Frank Blaha	Program Manager	USCG	216.902.6255	216.902.6277	Frank.A.Blaha@uscg.mil	<i>Frank A. Blaha</i> 4/29/11	NA
Lynn Keller	Project Manager	USCG	216.902.6258	216.902.6277	Lynn.M.Keller@uscg.mil	<i>Lynn M. Keller</i> 4/26/11	NA
Owen Thompson	USEPA Remedial Project Manager	USEPA Region 5	312.886.4843	312.353.8426	Thompson.Owen@epa.gov	<i>Owen Thompson</i> 4/27/11	NA
Joseph Logan	Project Coordinator	Tetra Tech NUS, Inc.	412.921.7231	412.921.4040	Joe.Logan@tetrattech.com	<i>Joseph Logan</i> 4/26/11	NA
Joseph Samchuck	Data Quality Assurance Manager	Tetra Tech NUS, Inc.	412.921.8510	412.921.4040	Joseph.Samchuck@tetrattech.com	<i>Joe Samchuck</i> 4/26/11	NA

QAPP Worksheet #1G Title and Approval Page

Investigative Organization's Project Quality Assurance Manager:	
	Signature
	Joseph Samchuck, Tetra Tech NUS, Inc.
Lead Organization's Program Manager:	
	Signature
	Frank Blaha, USCG Program Manager

Document Control Number:

QAPP Worksheet #1G Title and Approval Page

Site Name/Project Name:	Atwater Facility
Site Location:	Harborfront land property in downtown Detroit, Wayne County, Michigan. Companion document Field Sampling Plan Groundwater and Soil (FSPG&S) Tetra Tech NUS, Inc., 2011; Figures 1 and 2 provide the site locations.
Document Title:	U.S. Coast Guard Quality Assurance Project Plan Addendum – Groundwater and Soil, USCG Atwater Facility, Detroit, Michigan
Lead Organization:	U.S. Coast Guard
Preparer's Name and Organizational Affiliation:	Joseph Logan, Tetra Tech NUS, Inc. / Shannon Hill, Tetra Tech NUS, Inc.
Preparer's Contact Information:	661 Andersen Drive, Pittsburgh, PA 15220 412-921-7090; Joe.Logan@tetrattech.com / Shannon.Hill@tetrattech.com
Preparation Date:	December 2009 to April 2011
Lead Organization's Project Manager	
	Signature
	Lynn Keller, USCG Project Manager
Investigative Organization's Project Coordinator	
	Signature
	Joseph Logan, Tetra Tech NUS, Inc.